

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OLD LADDER LITIGATION CO., LLC, as
Litigation Deisgnree on behalf of the Liquidation Trust,

Plaintiff,

-against-

INVESTCORP BANK B.S.C., et al.

Defendants.

08 Civ. 0876 (RMB)

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

PLEASE TAKE NOTICE that upon the annexed Declaration of Blair G. Connelly, dated March 18, 2008, the accompanying Declaration of James Wald, dated March 11, 2008, and the exhibit annexed thereto, the undersigned moves this Court for an Order, pursuant to Rule 1.3(c) of the Local Rules for the United States District Court for the Southern and Eastern Districts of New York, admitting James Wald to the bar of this Court *pro hac vice* in order to argue and try the above-captioned case as counsel for Defendants Green & Partners, L.P., LGP Management, Inc., Green Equity Investors III, L.P., Werner Co-Investment LLC, Peter Nolan, and Michael Wong.

Dated: New York, New York
March 18, 2008

LATHAM & WATKINS LLP

By: 

Blair G. Connelly (BC-0237)

885 Third Avenue, Suite 1000
New York, New York 10022
(212) 906-1200

Attorneys for Green & Partners, L.P., LGP Management, Inc., Green Equity Investors III, L.P., Werner Co-Investment LLC, Peter Nolan, and Michael Wong

MAR 18 2008

FILED
U.S. DISTRICT COURT
2008 MAR 18 AM 4:46
S.D.N.Y.

921 825 64558

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OLD LADDER LITIGATION CO., LLC, as
Litigation Deisgnee on behalf of the Liquidation Trust,

Plaintiff,

-against-

INVESTCORP BANK B.S.C., et al.

Defendants.

08 Civ. 0876 (RMB)

**ORDER GRANTING MOTION TO
ADMIT COUNSEL PRO HAC VICE**

This matter having been brought before the Court by motion to admit James Wald *pro hac vice* to appear and participate as counsel for Defendants Green & Partners, L.P., LGP Management, Inc., Green Equity Investors III, L.P., Werner Co-Investment LLC, Peter Nolan, and Michael Wong in the above-captioned action, and the declaration of such attorney having been submitted in support thereof, and it appearing that such attorney is a member in good standing of the bar of the state in which he is admitted to practice law, and there are no disciplinary proceedings against him as a member of the bar in any jurisdiction; it is

ORDERED that, pursuant to Local Civil Rule 1.3(c) of this Court, James Wald of the State of California bar is admitted *pro hac vice* to practice before this Court as counsel for Defendants Green & Partners, L.P., LGP Management, Inc., Green Equity Investors III, L.P., Werner Co-Investment LLC, Peter Nolan, and Michael Wong in these proceedings.

Dated: _____, 2008

Honorable Richard M. Berman
United States District Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OLD LADDER LITIGATION CO., LLC, as
Litigation Deisgnee on behalf of the Liquidation Trust,

Plaintiff,

-against-

INVESTCORP BANK B.S.C., et al.

Defendants.

08 Civ. 0876 (RMB)

**DECLARATION OF
BLAIR G. CONNELLY**

BLAIR G. CONNELLY, pursuant to 28 U.S.C. § 1746, hereby declares under the penalty of perjury as follows:

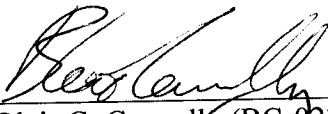
1. I am a member of the law firm of Latham & Watkins LLP, counsel for Defendants Green & Partners, L.P., LGP Management, Inc., Green Equity Investors III, L.P., Werner Co-Investment LLC, Peter Nolan, and Michael Wong in this action. I submit this Declaration in support of the motion, pursuant to Local Rule 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, for an Order granting James Wald admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York in order to argue and try the above-captioned case.

2. I am a member in good standing of the bar of this Court.

3. I have reviewed the Declaration of James Wald in support of the motion for admission *pro hac vice* submitted herewith, and I believe that the declaration is true and correct. James Wald is fully familiar with the facts of this case.

4. Upon the foregoing facts, I respectfully request that the Court grant the motion for the admission *pro hac vice* of James Wald to the bar of the United States District Court for the Southern District of New York.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on this 18 day of March, 2008, in New York, New York.


Blair G. Connelly (BC-0237)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OLD LADDER LITIGATION CO., LLC, as
Litigation Deisgnee on behalf of the Liquidation Trust,

Plaintiff,

-against-

INVESTCORP BANK B.S.C., et al.

Defendants.

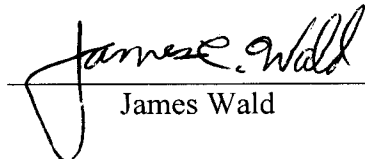
08 Civ. 0876 (RMB)

**DECLARATION OF
JAMES WALD**

JAMES WALD, pursuant to 28 U.S.C. § 1746, hereby declares under the penalty of perjury as follows:

1. I am associated with the law firm of Latham & Watkins, LLP, located at 633 West Fifth Street, Suite 4000, Los Angeles, California, 90071.
2. I submit this Declaration in support of the motion to admit counsel *pro hac vice* in the above-captioned matter. As demonstrated by the Certificate of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of California.
3. There are no pending disciplinary proceedings against me in any State or Federal Court.
4. Wherefore, I respectfully request that I be permitted to appear as counsel and advocate *pro hac vice* in the above-captioned case.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 11th day of March, 2008, in Los Angeles, California.


James Wald



Supreme Court of California

FREDERICK K. OHLRICH

Clerk of the Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that **James C. Wald**, was on the 8th of December, 2003, duly admitted to practice as an attorney and counselor at law in all the courts of this state; and that his/her name now appears on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court,
this 11th day of March, 2008.*

FREDERICK K. OHLRICH

Clerk of the Supreme Court

By

A handwritten signature in black ink, appearing to read "Patricia A. Quinn", is written over a horizontal line.

Patricia A. Quinn, Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OLD LADDER LITIGATION CO., LLC, as
Litigation Deisgnee on behalf of the Liquidation Trust,

Plaintiff,

-against-

INVESTCORP BANK B.S.C., et al.

Defendants.

08 Civ. 0876 (RMB)

CERTIFICATE OF SERVICE

I, Jessica Bengels, hereby certify that on March 18, 2008, true and correct copies of Notice of Motion to Admit Counsel Pro Hac Vice, dated 3/18/08, Order Granting Motion to Admit Counsel Pro Hac Vice, Declaration of Blair G. Connelly, dated 3/18/08, and Declaration of James Wald, dated 3/11/08, were caused to be served in accordance with the Federal Rules of Civil Procedure, via first class mail upon all parties and counsel listed on the attached service list.

Dated: New York, New York
March 18, 2008

LATHAM & WATKINS LLP

By: 

Jessica Bengels (JB-2290)

885 Third Avenue, Suite 1000
New York, New York 10022-4802
Tel: (212) 906-1200
Fax: (212) 751-4864

Old Ladder Litigation Co., LLC v. Investcorp Bank B.S.C., et al.,
Case No. 08 CV 0876 (RMB)
Service List

PLAINTIFF	COUNSEL
Old Ladder Litigation Co. LLC	White & Case LLP 633 West Fifth Street, Suite 1900 Los Angeles, CA 90071-2007 Contact: Ron Gorsich Phone (213) 620-7700 www.whitecase.com
DEFENDANTS	COUNSEL
John Thigpen	Schnader Harrison Segal & Lewis LP Fifth Avenue Place 120 Fifth Avenue Suite 2700 Pittsburgh, PA 15222-3001 Contact: John K. Gisleson Phone: (412) 577-5216 JGisleson@schnader.com
Annisville Limited Ballet Limited C.P. Holdings Limited CIP Limited Climbing Products Limited Cooperstown Limited Denary Limited Equity WERA Limited Frisco Limited Gleam Limited Highlands Limited Investcorp Bank B.S.C. Investcorp Holdings Limited Investcorp International, Inc. Investcorp Investment Equity Limited Investcorp S.A. Investcorp Werner Holdings L.P. Invifin, S.A. Ladder Equity Limited Noble Limited Outrigger Limited Ownership Holdings Limited Platea Limited	Skadden, Arps, Slate, Meagher & Flom LLP One Rodney Square P.O. Box 636 Wilmington, Delaware 19899 Contact: Anthony Clark Phone: (302) 651-3080 Direct fax: (888) 329-3081 tclark@skadden.com

PLAINTIFF	COUNSEL
Quill Limited Radial Limited Shoreline Limited SIPCO Limited Step Investments Limited StepUp Limited Werner Equity Limited Werner IIP Limited Werner Investments Limited WL Holdings Limited Zinnia Limited Charles Marquis Christopher Stadler Dana Snyder James Baker James Egan James Hardyman Mamoun Askari Stephen Tempini Thomas Sullivan	
Alligator Partners, L.P. (Howard Solot And Janet Solot - General Partners) Allison Tyler Karp (Minor) Barbara L. Werner Barbara L. Werner And Donald M. Werner Beth Katz Beverly Werner Needham Brad J. Gellis Bruce D. Werner Bruce D. Werner - Trust (Bruce Werner - Trustee) Bruce D. Werner Family Limited Partnership (Bruce Werner – Managing General Partner) Craig R. Werner Family Limited Partnership (Craig Werner – General Partner) Craig R. Werner Trust Craig Werner Debra A. Rothman Dennis J. Johnson Donald E. Achenbach Donald M. Werner Eli Berk-Rauch	Cohen & Grigsby, P.C. 11 Stanwix Street 15th Floor Pittsburgh, PA 15222-1319 Phone: (412) 297.4900 Fax: (412) 209.0672 Contact: Larry Elliott LElliott@cohenlaw.com

PLAINTIFF	COUNSEL
<p> Elise W. Frost Elissa Schwartz (Now Elissa Rioux) Ellen Berk Rauch Eric A. Mason Eric Werner Florence J. Werner Florence J. Werner- Irrev. Trust Dated 10/7/94 (Ronald Werner, Marc Werner And Michael Werner – Trustees) Gail Rauch Blackman Hanna Berk-Rauch Heather Blackman Henry W. Dowler Howard L. Solot Ira And Elise Frost Family Limited Partnership (Elise Frost – General Managing Partner) Isabelle Werner J. David Goldblatt Janet F. Solot Jonathan C. Werner Gift Trust U/A/D/ 11/1/96 (Jeffrey Weisman - Trustee) Jordana Rothman Joshua J. Rothman June Goldblatt Kevin M. Rothman Laura W. Werner Revocable Trust, U/Aid 1/2/96 (Laura Werner - Trustee) Lee L. Basilotta Lois S. Werner Revocable Trust Marc Werner Marc Werner Irrevocable Trust Margot A. Werner Gift Trust U/A/D 11/1/96 (Laura Werner - Trustee) Marsha Beth Karp Maurice Weiner Melanie Werner Melissa S. Karp (Minor) Michael E. Werner Michael E. Werner Revocable Trust, U/A/D 12/96 (Michael Werner - Trustee) Michael Solot Michael Trzynka Mindy Werner Alter </p>	

PLAINTIFF	COUNSEL
<p>Noel Berk-Rauch Paula J. Griffith Rankell Family Trust Rauch Trust (Aleen A. Shapiro – Trustee) Richard L. Werner Richard L. Werner Revocable Trust Richmond Drive Enterprises, L.P. (Richard Werner And Elise Frost – General Partners) Richmond I. Rosati (Minor) Robert A. Rosati Robert I. Werner Robert I. Werner - Irrev. Trust Dated 8/30/94 (Ronald Werner – Administrative Trustee) Ronald E. Werner Roni S. Rosati Ross Daniel Rosati (Minor) Ryan Gregory Rosati Shirley W. Rauch Trust (Shirley Rauch, And Marlane Krone – Trustees) Sophie Werner Stephanie N. Werner Gift Trust U/A/D 11/1/96 (Jeffery Weisman – Trustee) Susan Morrow Suzanne Schwartz Tammy H. Werner Werner GC Trust For Erin Joy Ryan (Beverly Werner Needham - Trustee) Werner GC Trust For Shannon Rose Ryan (Beverly Werner Needham – Trustee) Werner-Alter, Llc (Mindy Werner Alter - Manager) William Hazlett William J. Rippin</p>	
<p>Loughlin Meghji & Co., Inc.</p>	<p>Morris, Nichols, Arsht & Tunnell LLP Chase Manhattan Centre, 18th Floor 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899-1347</p> <p>Contact: Gregory W. Werkheiser gwerkheiser@mnat.com</p>
<p>Steven R. Bentson</p>	<p>Foley & Mansfield PLLP</p>

PLAINTIFF	COUNSEL
	<p>250 Marquette Avenue Suite 1200 Minneapolis, MN 55401</p> <p>Contact: Thomas W. Pahl Phone: 612-338-8788 x206 Fax: 612-338-8690 tpahl@foleymansfield.com</p>
Lisa A. Pressler	<p>Michael Oleyar 1261 North Church Street Hazleton, PA 18202</p> <p>570-455-6800 mgolaw@verizon.net</p>
<p>Garcell 1997 Unitrust - 12/19/1997 Vincent J. Garcell Vincent J. Garcell Living Trust</p>	<p>Burkhalter Kessler Goodman & George LLP 2020 Main Street, Suite 600 Irvine, California 92614</p> <p>Contact: Daniel J. Kessler Tel (949) 975-7500 Fax (949) 975-7501 dkessler@bkgglaw.com</p>
Karen Lynn Moseska	<p>Nixon Peabody LLP 437 Madison Avenue New York, New York 10022</p> <p>Contact: Joshua J. Larocca Phone: 212-940-3191 Fax: 866-302-3998 jlarocca@nixonpeabody.com</p>
Murray Devine & Co., Inc.	<p>Levi Lubarsky & Feigenbaum LLP 1185 Avenue of the Americas, 17th Floor New York, New York 10036 Tel: (212) 308-6100 Fax: (212) 308-8830</p> <p>Contact: Howard B. Levi hlevi@llf-law.com</p>
<p>Gary Stewart Stewart Charitable Remainder Unitrust (Gary Stewart, Trustee) Stewart Charitable Remainder Unitrust (Ilene Stewart, Trustee) Ilene Stewart Suzanne Rosen Novak Partnership AKA A California Limited Partnership (Alyce Novak,</p>	<p>Kennedy Johnson Gallagher LLC 99 Wall Street New York, NY 10005</p> <p>Contact: Peter J. Gallagher Phone: 212-248-2230 PGallagher@kjglaw.com</p>

PLAINTIFF	COUNSEL
Trustee) Alyce Novak	
David A. Cardillo 23 St. Glory Road Greenville, PA 16125 david.cardillo@signaturealuminum.com	N/A
Kevin Walz 93 Werner Road, Building A Greenville, PA 16125	N/A
Steve A. Richman 55 Sandpiper Lane Lake Forest, IL 60045 Steven.Richman@milwaukeeetool.com	N/A
John Remmers 7005 Cochran Rd. Grenwillow, OH 44139-4303 John.Remmers@ttifloorcare.com	N/A
Christopher Filardi 93 Werner Road Greenville, PA 16125 FilarCG@wernerco.com	N/A
David A. McGowan 524 Spring Crest Dr. El Paso, Texas 79912 mcgowda@wernerco.com	N/A
David M. Conn 731 Bob White Drive Hermitage, PA 16148 conndm@wernerco.com	N/A
John J. Dylik 1022 West 41st Street La Grange, IL 60525 dylik@sbcglobal.net	N/A
Neal R. Martin 50 Fredonia Road Greenville, PA 16125 kmartin60@neo.rr.com	N/A
Richard M. Kelly 1131 Bulh Circle Hermitage, PA 16148 kellyrm@wernerco.com	N/A

PLAINTIFF	COUNSEL
Robert H. Pinney 3387 Locksley Court Merced, CA 95340 PinneRH@wemerco.com	N/A
Vincent A. Genis 1619 Mcdowell Street Sharon, PA 16146 va_genis@hotmail.com	N/A
Wendy A. Meikle 5075 Gardner Barclay Rd. Farmdale, OH 44417-9733 meiklwa@wernerco.com	N/A